

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COLLEEN O'DONNELL,)	
)	
Plaintiff,)	
)	Civil Action No: 04-40190-FDS
v.)	
)	
ALBERTO R. GONZALES, ATTORNEY)	
GENERAL, U.S. DEPARTMENT)	
OF JUSTICE,)	
)	
Defendant.)	

**DEFENDANT'S MOTION FOR LEAVE TO FILE MEMORANDUM
OF LAW IN EXCESS OF TWENTY PAGES (ASSENTED TO)**

Defendant, Alberto R. Gonzales, the Attorney General for the United States of America, by his attorney, Michael J. Sullivan, the United States Attorney for the District of Massachusetts, hereby moves for leave from Local Rule 7.1(B)(4) to file a Memorandum of Law in Support of its Cross-Motion for Summary Judgment that exceeds twenty (20) pages. The government believes that the memorandum, which is only thirty-six (36) pages, clarifies the issues before the Court and will assist it in reaching a decision on the parties' motions for summary judgment.

Dated: March 16, 2006

ALBERTO R. GONZALES,
Attorney General, U.S.
Department of Justice

By his attorney,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Damian W. Wilmot
Damian W. Wilmot
Assistant U.S. Attorney
1 Courthouse Way
Boston, MA 02210
(617) 748-3398

CERTIFICATION UNDER L.R. 7.1

I certify that in accordance with Local Rule 7.1, on March 15, 2006, I have conferred with Plaintiff's counsel and she assents to the above motion.

/s/ Damian W. Wilmot
DAMIAN W. WILMOT
Assistant U.S. Attorney